

Petition of KeySpan Energy Delivery New England
for Approval of its Long-Range Forecast and Resource
Plan for the five-year period 2001/02 though 2005/06
pursuant to G.L. c. 164, §§ 69 (I) *et. seq.*

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6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide four copies of each response.
16. The term "Company" refers to KeySpan Energy Delivery-New England. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

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The following are the Attorney General's First Set of Document and Information Requests in the above captioned proceeding.

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Boston Gas Company–Algonquin Gas Service Area, Boston Gas Company–Tennessee Gas Service Area , Colonial-Lowell, Colonial-Cape, and Essex Gas.

- AG-1-5 Please provide a listing of all production area gas supply (commodity) contracts held by each: KSEDNE, Boston Gas, Colonial and Essex Gas. Include the MDCQ, the termination date, deliverability and availability bases, the details of the pricing provisions and a copy of the Department's approval of each contract.
- AG-1-6 Please provide a listing of all market area gas supply (commodity) contracts held by each: KSEDNE, Boston Gas, Colonial and Essex Gas. Include the MDCQ, the termination date, deliverability and availability bases, the details of the pricing provisions and a copy of the Department's approval of each contract.
- AG-1-7 Refer to Table G-24. Please provide a copy of the Distrigas original contract and all amendments. Include all pricing terms.
- AG-1-8 Refer to Chart II-A-2. Please provide a key providing detailed definitions for all abbreviations and terms appearing in the Daily Game Plan.
- AG-1-9 Refer to Chart II-A-2. Please provide a schematic presentation of the Daily Game Plan for each of the KSEDNE Gas Service Areas (Boston Gas Company–Algonquin Gas Service Area, Boston Gas Company–Tennessee Gas Service Area , Colonial-Lowell, Colonial-Cape, and Essex Gas) showing volumes delivered under specific contracts (commodity and transportation) from the gas source to the city gate. Identify each contract by vendor name and contract number.
- AG-1-10 Please provide all analyses performed by the Company or consultants of the Company's capacity management arrangement with El Paso. What has the Company gained from this experience and how will the Company proceed when the contract terminates. This response should contain a detailed, candid discussion of its evaluation of not only the El Paso deal, but also, the Company plans regarding capacity management in the future.

Dated: March 26, 2002